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July 16, 2014

VIA ECF

The Honorable Sandra J. Feuerstein
United States District Judge
United States District Court for
the Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Cecil Thomas et al. v. TXX Services, Inc. et al.
U.S. District Court for the Eastern District of New York
Civil Action No. 2:13-CV-02789-SJF-WDW

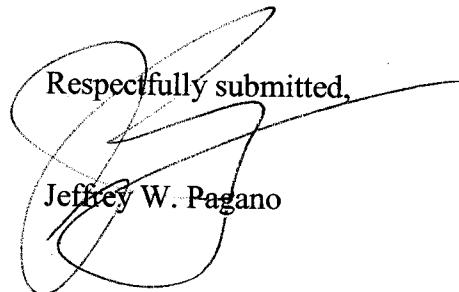
Dear District Judge Feuerstein:

We represent Defendants TXX Services, Inc. ("TXX") and Patricia Hunt ("P. Hunt") (collectively, "Defendants") in connection with the above-referenced action. We write in order to request for good cause, specifically compelling family reasons, as described below, an extension of time for the filing of summary judgment papers, in accordance with the Civil Cause for Telephone Status Conference [Docket No. 113] ("Order"), issued by the Court following the June 24, 2014 telephone status conference in this action. According to the Order, and as addressed at the June 24, 2014 conference, any supplemental summary judgment papers must be submitted, by Plaintiffs, by August 6, 2014. Based on this deadline, Your Honor directed that the Federal Rule of Civil Procedure 30(b)(6) deposition of TXX be conducted no later than July 24, 2014. Counsel for Plaintiffs has noticed this deposition to be conducted on July 22, 2014. The Order also scheduled a Further Status Conference to be conducted on October 30, 2014 at 11:15 a.m.

The young daughter of P. Hunt and her husband, John Hunt, who we expect will both be designated by TXX for the Rule 30(b)(6) deposition, has taken ill and has been, and remains, hospitalized. The Hunts' daughter is expected to require significant constant care for at least the next three weeks, obviating their ability to participate in the noticed Rule 30(b)(6) deposition. In order to allow the Hunts to attend to their daughter during this very stressful period, in a manner that does not prejudice any of the parties, we respectfully request an extension of time, until September 8, 2014, for the submission of any supplemental summary judgment papers, with the understanding that the Rule 30(b)(6) deposition will be conducted commencing August 22, 2014.

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This is the first request for an extension of these deadlines. Plaintiffs' counsel agrees to this request for the reasons stated.


Respectfully submitted,
Jeffrey W. Pagano

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